

**THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

**JAMES D. JOHNSON, as next friend to
Olivia Y., et al.**

PLAINTIFFS

vs.

CIVIL ACTION NO.: 3:04-CV-251-TSL-FKB

**PHIL BRYANT, as Governor
of the State of Mississippi, et al.**

DEFENDANTS

JOINT MOTION FOR ENTRY OF AN INTERIM REMEDIAL ORDER

The parties jointly file this motion for entry of an Interim Remedial Order as contemplated by paragraph 6 of the July 23, 2015 Agreed Order Continuing the Hearing on Plaintiff's Renewed Motion for Contempt (the "Agreed Order") [Dkt. 664 at 3-4] and in support of this Motion state as follows:

1. On July 23, 2015, this Court entered the Agreed Order directing that the parties negotiate a Court-enforceable Remedial Order based on the recommendations of the Final Organizational Analysis Report to be presented by Public Catalyst [Dkt. 664 at 3].
2. The parties have reached an agreement as to an Interim Remedial Order based on the recommendations of the Final Organizational Analysis Report prepared by Public Catalyst and which is being submitted to the Court contemporaneously with the filing of this joint motion.
3. Due to the self-explanatory nature of this joint motion, the parties respectfully request that the Court waive any requirement that a supporting memorandum of law be filed.

WHEREFORE, PREMISES CONSIDERED, the parties jointly request that this Court enter the Interim Remedial Order and for such other and further relief, in law or in equity, to which they may be entitled.

Respectfully submitted, this the 18th day of December, 2015.

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CERTIFICATE OF SERVICE

I, Dewitt L. Fortenberry, Jr., do hereby certify that I have on this day, electronically filed a true and correct copy of the forgoing document with the Clerk of Court using the ECF system which sent notifications of such to counsel as follows:

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SO CERTIFIED, this the 18th day of December, 2015.

/s/ Dewitt L. ("Rusty") Fortenberry, Jr.